

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding
Policies, Procedures and Rules for
Development of Distribution Resources
Plans Pursuant to Public Utilities Code
Section 769.

R.14-08-013
(filed August 14th, 2014)

**COMMENTS OF MISSION:DATA REGARDING
DISTRIBUTION RESOURCES PLANS DRAFT GUIDELINES**

FOR THE MISSION:DATA COALITION

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INTRODUCTION

Mission:data, a coalition of innovative companies that enable consumers to save energy and money through access to their own energy usage data and new technology tools¹, appreciates the opportunity to submit responses to staff's draft guidelines on Distribution Resource Plans (DRPs) in D.14-08-013. We previously submitted a response on September 5th, 2014 to DRP proposals from the Commission.

1) We applaud the staff's draft guidelines concerning the need for simplification of Distributed Energy Resources (DERs) interconnections, as well as simplification of measurement and verification (M&V), but more detail is needed.

The draft guidelines state that a central goal of DRPs is to “create a distribution grid that is ‘plug-and-play’ for DERs” (p. 5); as a result, the interconnection process must be “dramatically streamlined and simplified” (p. 5). We strongly believe that DER development and third party activity in the market will be significantly enhanced by reducing bureaucratic, technical and other barriers to participation, and Mission:data is glad to see the principle of simplification reflected in the draft guidelines.

With regard to data exchanges between DERs and the distribution operator (p. 21-22), we feel that more detail is needed to prevent barriers from inadvertently finding their way into the DRPs and, ultimately, implementation on the distribution grid. By way of example, prior to the Customer Data Access proceeding (D.13-09-025), any meter data exchanges between a utility and a third party could be described as complex, untimely and bureaucratic. To prevent the introduction of barriers regarding data exchanges of all types, including meter readings, we recommend that the Commission's guidelines require that utilities describe how any such barriers will be minimized to the greatest extent possible. In Section 6, “Barriers to Deployment” (p. 22), data exchanges should be a separate category and given its own treatment in detail.

In addition, the Commission may want to consider adding a standard of non-discrimination to the DRP guidelines as it relates to data exchanges. By recognizing that utilities, as incumbents, hold significant power and can easily cripple third party DERs by withholding or delaying the transmission of certain data, non-discriminatory access to third parties would be a reasonable addition to the guidelines.

¹ Our members are developing innovative information technologies to achieve significant energy savings in the residential, commercial and industrial sectors at scale. Members include Alarm.com, Bidgely, Blueline Innovations, Bright Power, BuildingIQ, the Cleanweb Initiative, EcoFactor, EnerNOC, EnergyHub, Genability, iControl Networks, Lucid, OpenUtility, People Power, Plotwatt, Rainforest Automation, Retroficiency, Solar City, ThinkEco, Verdafero, and WattzOn.

A simple, fair calculation methodology of avoided costs from DERs is also called for. Historically, M&V for efficiency programs has been complex to say the least. Thus we appreciate the staff's following remarks: "...barriers to broad participation involving complex and expensive measurement and verification schemes and related settlement processes should be simplified for DER" (p. 9). However, that is the only sentence in the draft guidelines regarding M&V. We feel it is both appropriate and necessary for the DRP guidelines to require a detailed examination of M&V simplifications. The utilities should be required to explain how baselines will be calculated for an individual customer that provides a capacity service on a distribution node, for example. We recognize that many such baselines and avoided cost methodologies are being discussed in the More Than Smart workshops, but they should be specified in guidelines, memorialized in the DRPs and approved by the Commission.

2) We support online maps and the release of distribution system parameters in open formats online.

Mission: data strongly supports online, universally-accessible information such as the Integration Capacity Analysis (p. 15) and GIS maps and power flow models (p. 25). We encourage the Commission to specifically require disclosure of power flow models and GIS data in open formats, where the software tools to open such files are inexpensive or free.

3) The Commission should provide specifics as to the demonstration project of locational benefits, and the Home Area Network (HAN) should be utilized in such demonstrations as appropriate.

The draft guidelines outline the need for a demonstration project. However, the guidelines were light on specifics. All too often, demonstration projects can become expensive and time-consuming diversions from the original intended purpose. The Commission can prevent such diversions by, for example, specifying the megawatts of load or capacity sought from third party DERs for each individual utility in a demonstration. The clearer the desired outcomes are articulated, the greater likelihood the Commission will receive its intended result.

Further, the HAN has, by nearly all accounts, been underutilized in California as a tool for both transmitting real-time usage and price information as well as controlling devices. The guidelines should specify that the HAN be utilized as a part of demonstration projects, whether in commercial or residential settings. We note that, if real-time actuation is required due to a signal or capacity constraint, the HAN is

uniquely situated to provide that information every 8-10 seconds, whereas ESPI in its current configuration is limited to an approximately 24-hour lag.

4) We strongly support reliance on the Energy Services Provider Interface (ESPI) for transmitting meter data to third party DERs.

We applaud staff for section b(ii) (p. 21) in which ESPI is specified as a data transfer mechanism from utilities to third parties. Given the large investment in ESPI by California ratepayers, Mission:data supports the explicit requirement that ESPI be used as the mechanism for transmitting time-series interval data such as kW, kWh and potentially other power quality metrics, as appropriate.

5) Mission:data strongly supports addressing the limitation that ESPI cannot be used for settlement with CAISO.

The discovery, earlier this year, that the IOUs would not provide “revenue-quality” data via ESPI was one of the causes of our protest filed April 7, 2014.² PG&E, in its amended advice letter 4378-E-A, stated it would, after a certain period of time, make revenue-quality data available and flag it as such. However, SDG&E and SCE stopped short of providing settlement-quality data in their amended advice letters, instead deeming ESPI data merely the “best available.” This is an obvious barrier to DER deployment insofar as third parties are envisioned to provide grid services to CAISO directly for the benefit of all ratepayers. We suggest that the draft guidelines more explicitly require the IOUs to describe how this flaw will be addressed.

6) The “Distribution System Market” must be clarified.

The guidelines make brief reference to a “Distribution System Market” (p. 26) without further elaboration. The guidelines need to expand on this notion if it is to be included; otherwise, reference to another concept of a distribution market should be eliminated since its brief mention adds confusion to an already complex topic.

² Mission:data protested PG&E advice letter 4378-E, SCE advice letter 3018-E, and SDG&E advice letter 2586-E on April 7th, 2014.

Thank you for your consideration.

Dated: December 12th, 2014

Respectfully submitted,
FOR MISSION:DATA

/s/

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